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*Lead Counsel for the  
Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. CV-07-5944-SC

MDL No. 1917

This Document Relates to:  
All Indirect Purchaser Actions

**DECLARATION OF MARIO N. ALIOTO IN  
SUPPORT OF INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR  
APPOINTMENT OF MARTIN QUINN AS  
SPECIAL MASTER**

Hearing Date: October 23, 2015  
Time: 10:00 a.m.  
Courtroom: One, 17<sup>th</sup> Floor  
Judge: Honorable Samuel Conti

1 I, Mario N. Alioto, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice  
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my  
4 firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“Plaintiffs”) in the above-  
5 captioned action, and as Counsel for Plaintiffs in the *Luscher* action that is also part of this MDL.  
6 The matters set forth herein are within my personal knowledge and if called upon and sworn as a  
7 witness I could competently testify regarding them.

8 2. I have represented consumers in numerous antitrust class actions. In my experience,  
9 settlements of this size typically draw objections. Plaintiffs anticipate a number of objections to both  
10 settlement approval and the requested award of attorneys’ fees—including objections by so-called  
11 professional objectors who typically appear in cases of this magnitude. Objections often relate to  
12 numerous aspects of settlement, such as the notice to the class, the notice program, and the plan of  
13 distribution to the class. Objections also are directed to claimed fees and expenses, and can often  
14 lead to a full-blown accounting exercise. In addition, discovery and motions to compel relating to  
15 these objections are often necessary. The goal of the professional objectors is to make revisions to  
16 the settlements, claim those revisions benefited the class, and then seek a fee award for this claimed  
17 benefit.

18 3. I represented indirect purchaser plaintiffs in the *LCD* litigation. Special Master  
19 Quinn served as Special Master in the *LCD* case. He handled all of the fee proceedings in that  
20 litigation. These proceedings were quite protracted, involving many objections, discovery regarding  
21 those objections, and other protracted disputes with the professional objectors. Lead Counsel  
22 believes similar issues and proceedings are likely to arise here as well. Since Special Master Quinn  
23 is already familiar with these matters, he is the logical choice to serve as Special Master in this case.

24 4. Special Master Quinn has stated that he is prepared to serve as Special Master if  
25 appointed, and that he has time to handle these potentially complex, drawn-out proceedings.

26 5. I believe that now is the time to make this appointment so that the Special Master is  
27 in place when the objections are filed and he can begin to assist in the settlement approval process as  
28 soon as possible. The appointment and use of the Special Master will materially advance the

1 litigation, thereby achieving considerable cost-savings to all parties. The Court can protect against  
2 unreasonable expenses and delay through regular communication with the Special Master.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day  
4 of September, 2015 at San Francisco, California.

5  
6 /s/ Mario N. Alioto  
7 Mario N. Alioto

8 ***Lead Counsel for the Indirect Purchaser***  
9 ***Plaintiffs***  
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